

## MONERO RULE PR Reg Guile



ROCHESTER GAS AND ELECTRIC CORPORATION . 89 EAST AVENUE, ROCHESTER, N.Y. 14649

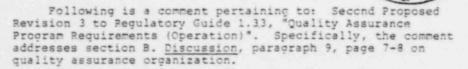
\*\*\*\*\*\*\*\*\* 546-2700

Extension 2513

January 19, 1981

Secretary of the Commission U.S. Muclear Regulatory Commission Washington, DC 20555 Attention: Docketing and Service Branch

Dear Sir:



Sufficient authority and organizational freedom to identify quality problems does not seem to be affected positively or negatively by whether or not an on-site quality group reports to station management or to off-site quality assurance management. Pather, per my seven years related experience, any pressures to ignore quality problems have been imposed through the off-site quality assurance management. The independence of the quality on-site inspection and audit personnel are adversely affected by the lack of ability of the off-site quality assur noe management to withstand pressure from upper management (Lugineering and Nuclear Operations). More emphasis should be placed on assuring the off-site quality assurance management is relieved of external pressures from company upper management, including his department superiors.

In summary, the ability of a quality assurance organization, both on-site and off-site, to function effectively and independently is highly dependent on the personality strengths and technical expertise of the corporate quality assurance manager. Minimum levels of experience, education and training should be established in the appropriate NRC Regulatory Guide specifically for the Quality Assurance Manager.

ROCHESTER GAS AND ELECTRIC CORP.

DATE January 19, 1981

70 Secretary of the Commission

Thank you for consideration of my comments.

Yours truly,

Scott ". Bullock

SVB:dmaD19

1000000 by and 1/22/8/5